## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	
v.	)	No. 4:06CV01064 CEJ
BETONSPORTS PLC,	)	
Defendant.	) ) )	

## TEMPORARY RESTRAINING ORDER,

This cause coming on to be heard on Plantiffs' Motion for Temporary Restraining Order,
Plaintiff having appeared *ex parte*, and the court having been duly advised in the premises,

This Court finds:

- 1) Plaintiff has demonstrated that it is likely to succeed on the merits of its claims.
- 2) Plaintiff will suffer irreparable harm in the absence of a temporary restraining order.
- Plaintiff will suffer more harm if temporary injunctive relief is not granted than Defendants will suffer if such temporary injunctive relief is granted. There is no evidence that defendant will suffer any unjust damage as a result of a temporary suspension of its illegal business in the United States. The case will be heard and adjudicated on an expedited basis to reduce any potential harm to Defendant.
- 4) Injunctive relief is compatible with the public interest because Plaintiff is seeking to enforce laws that are designed to protect the public's interest.

Having considered the Plaintiff's "Complaint for a Temporary Restraining Order. . . and Other Equitable Relief;" the supporting "Affidavit of Det. Brian Mize and its Exhibits A, B and C' the "Plaintiff's Memorandum of Law in Support of its *ExParte* Motion for Temporary Restraining Order. . . " and the "Declaration and Certification of U.S. Counsel Pursuant to Fed. R. Civ. P. 65(b). . . ," it is hereby ORDERED and ADJUDGED that this Court's temporary restraining order shall issue and, until such time as a hearing shall be held within ten days of this date on Plaintiff's request for permanent injunctive relief, such hearing, to be scheduled upon the return to the District of U.S. District Judge Carol E. Jackson, to whom this case is assigned, this Court hereby ORDERS that:

- A. the defendant, its agents, contractors and other entities having possession or control of the instrumentalities used by the defendant, its officers, employees, and all persons participating in or assisting in the defendant's operation are barred:
- (1) from continuing to perpetrate the defendant's fraudulent scheme of operating an illegal gambling business through Internet web sites and telephone services in violation of 18 U.S.C. §§ 1341 & 1343;
- (2) from continuing to operate or control or cause the operation of any web site that purports to offer sports betting, or transmit betting information in the United States;
- (3) from continuing to operate or control or cause the operation of any telephone service that purports to offer sports betting, or transmit betting information in the United States;
- (4) from soliciting and accepting wagers on sports and sporting events from persons in the jurisdiction of the United States;

- (5) from causing the transmission of wagering information using interstate and international wire communications facilities within the United States;
- (6) from causing the transmission of funds solicited from persons in the United States for the purpose of placing wagers on sports and sporting events to the defendant and its agents outside the United States;
- (7) from advertising, by any method, or in any media, or causing the advertising of any gambling activity which is in violation of United States law, specifically 18 U.S.C. § 1084 (the "Wire Wager Act");
- (8) from transporting gambling paraphernalia, or causing the transportation of gambling paraphernalia in the United States, in violation of United States law, specifically 18 U.S.C. § 1952;
- (9) from transferring or causing the transfer of funds to the United States, within the United States, or from the United States in violation of United States law, specifically 18 U.S.C. §§ 1956 and 1957; and
- (10) from causing persons or items to move in interstate or foreign commerce within the United States in violation of United States law, specifically 18 U.S.C. §§ 1952 and 1953; and,
  - B. During the period that this temporary restraining order shall remain effective,
- (1) the defendant is not to transfer, convert, encumber or sell any of the domain names listed on Exhibit A, attached to Detective Mize's Affidavit and herein incorporated by reference;

- (2) the registrars and registries, specifically Directnic, Register.com,
  GoDaddy.com and Network Solutions are not transfer, cancel, or otherwise make changes to the
  domain name registrations for any of the domain names listed in Exhibit A without explicit
  instructions from the Court;
- (3) the defendant must inform the providers of telephone services listed in Exhibit C, attached to Detective Mize's Affidavit and herein incorporated by reference, that it is ceasing illegal operations in the United States, and that it will no longer accept wagers, or allow the transmission of betting information through interstate and foreign communication facilities in the U.S., such being and having been in violation of federal law;
- (4) the defendant must return to the sender all funds in its possession received from persons in the United States, for the purpose of opening a sports betting wagering account;
- (5) the defendant must set up a toll free telephone service for each web site it operates, to provide refund information to each person in the United States who has a wagering account with each web site operated by the defendant in the United States;
- (6) the defendant must post, on each web site it operates that is accessible from the United States, the following message on its primary access page:

THIS WEB SITE DOES NOT ACCEPT WAGERS ON SPORTS OR SPORTING EVENTS FROM PERSONS IN THE UNITED STATES. IT IS A VIOLATION OF UNITED STATES LAW TO TRANSMIT SPORTS WAGERS OR BETTING INFORMATION TO THIS WEB SITE FROM THE UNITED STATES. IF YOU HAVE A WAGERING ACCOUNT WITH THE OPERATORS OF THIS WEB SITE, PLEASE CALL [TOLL FREE TELEPHONE NUMBER] TO ARRANGE A REFUND.

(7) the defendant must provide an automated message on each telephone wagering service it operates in the United States, stating the following:

THIS TELEPHONE SERVICE DOES NOT ACCEPT WAGERS ON SPORTS OR SPORTING EVENTS FROM PERSONS IN THE UNITED STATES. IT IS A VIOLATION OF UNITED STATES LAW TO TRANSMIT SPORTS WAGERS OR BETTING INFORMATION ON THIS TELEPHONE LINE. IF YOU HAVE A WAGERING ACCOUNT WITH THE OPERATORS OF THIS TELEPHONE LINE, HANG UP AND CALL [TOLL FREE TELEPHONE NUMBER] TO ARRANGE A REFUND.

(8) the defendant must place the following statement as a full page advertisement in a newspaper of national U.S. circulation (i.e., The Wall Street Journal or USA Today];

BETONSPORTS PLC, WHICH OWNS AND OPERATES THE LISTED INTERNET WEB SITES AND TELEPHONE BETTING SERVICES [insert list], IS NO LONGER ACCEPTING WAGERS FROM PERSONS IN THE UNITED STATES. IT IS A VIOLATION OF UNITED STATES LAW TO TRANSMIT SPORTS WAGERS OR BETTING INFORMATION USING INTERSTATE OR INTERNATIONAL TELEPHONE LINES. IF YOU HAVE A WAGERING ACCOUNT WITH A BETONSPORTS PLC SPORTSBOOK OR TELEPHONE WAGERING SERVICE, PLEASE CALL [TOLL FREE TELEPHONE NUMBER] TO ARRANGE A REFUND.

## FURTHERMORE, this Court hereby

- C. Orders the defendant, its agents, employees, attorneys, and all persons acting in concert and in participation with it to provide to the United States the following materials within seven (7) calendar days:
- (1) a list of all financial institutions, including but not limited to banks and brokerage houses, at which the defendant currently maintains or has maintained savings, checking or other accounts during the previous five (5) years;

- a list of all the names under which the defendant has operated in (2) the United States, including the names of individual persons, entities and trademarks; and
  - all business records relating to the scheme described in this (3)

Complaint and the attached Affidavit.

This order shall remain in effect for ten day emles otherwise ordered by the court.

SO ORDERED:

Honorable Catherine D. Perry

United States District Judge

Date: July 17, 2006 2:18 p.m.

## **EXHIBIT A**

007betonsports.com

1001 nightcasino.com

100bets.com

100yardssportsbettingguide.com

105juice.com 105sports.com

123sportbet.com

123sportsbets.com

1800betonsports.com

1betstreet.com

1 sportsaction.com

1webbet.com

2beteurosports.com

2betnasa.com

2betthenet.com

2eurobet.com

2ranksportsbook.com

2ratesports.com

2sportingbet.com

2sportswager.com

365wager.com

60minutesports.com

60minutessports.com

8889999bet.com

8889999bets.com

888999bets.com

999bets.com

999sportsbook.com

999wager.com

afootballcontest.com

aladinsports.com

amazingplays.com

apostadme.com

apostale.com

apostame.com

apostandoenlinea.com

apostandoity.com

apostandole.com

apostandoles.com

apostarity.com

apostarleitv.com

apostasemesportes.com

apostasxcelular.com

apostem.com

apuestamex.com

apuestascelulares.com

apuestasendeportes.com

apuestasity.com

apuesteendeportes.com

apuesteitv.com

apuestele.com

apuestelecasino.com

apuesteleitv.com

asportingbet.com

baseball-betting-bonus.com

bestplacestobet.com

bet1st.com

betabeter.com

bet-bets.com

betbos.com

betdunyasi.com

betelite.com

betfantasyonline.com

betgg.com

betherock.com

betinfimity.com

betinfimity.net

betmvp.com

betmvp.net

bet-nfl-games.com

beton168.com

betonamericanfootball.com

betonasa.com

betonbabes.com

betonbos.com

betoneurosports.com

betonevents.com

betonfantasy.com

betonfutebol.com

betongirls.com

betoninternet.com

betoninternet.net

betonmlb.net betonmobiles.com betonnasa.com betonnascar.com

betonnascar.com betonsport.net bet-on-sports.biz betonsports.com betonsports.info

bet-on-sports.us betonsports1.com betonsports123.com betonsports2.com betonsports3.com

betonsportsasia.com betonsportsasia.net

betonsportsasiacasino.com

betonsportscasino.com betonsportselite.com betonsportsflash.com betonsportsitv.com betonsportspoker.net betonsportsq.com betonsportsquick.com betonsports-taxfree.com

betonsportstf.com betonsportswager.com

betontrack.com
betsandbabes.com
betsandgirls.com
bets-football.com
betthecards.com
betthecup.com
betthefield.com
bettherock.com
bettherockpoker.biz

bettherockpoker.net

bettinginstitute.com

bettingitv.com
bettorsroom.com
bettorstrust.biz
bettorstrust.info
bettorstrust.org
bettorstrust1.com
bettorstrustcasino.com
bettrackodds.com

betus123.com betwithbos.com betwithnasa.com bet-world-cup.com betxtreme.com bigbolasports.com

bigtimewagering.com

bingo1st.com
bingoonitv.com
bitbets.com
bjudpasport.com
bos4fun.com
bosaffiliate.com
bosantigua.com
bosarcade.com
bosasiacasino.com
bosbaseball.com
bosbasketball.com

bosbet.com bosbets.com bosbingo.com bosblackjack.com bosboxing.com boscasino.biz boscasino.info boscasino.net boscasino.org boscasino.us boschallenge.com bosdoom.com boselite.com bosflash.com bosfootball.com bosforfun.com bosfun.com

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eurosportingbet.com ez-shop-online.com

firstbet.us

football-bet-bets.com football-betting-bets.com footballbettingcontest.com

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fullodds.com futbolitv.com gamble168.com

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globalfoot.com gololottocr.com grannypenny.com grupodenasa.com gsmsportwedden.com

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iwannabetsports.com

jagbet.biz jagbet.info jagbet.net jagbet.org jagbet.us

jag-casino-affiliate-program.com

jagpoker.com
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jagpokerclub.com
jagpool.com
jagsportsbet.biz
jagsportsbet.info
jagsportsbet.net
jagsportsbet.org
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latinladieslive.com lines-football.com lines-nfl.com listadejuegos.com loteriadeportiva.com

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milleniumsportsbook.com

millpoker.com millsports.com millsports.net

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Monday-night-football.com Monday-night-odds.com Monday-night-wager.com

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nasakasino.com nasaplayers.com nasasport.com nasasport.net

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betonworldcupsoccer.com

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